

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

U.S. Magistrate Judge

WYNDHAM VACATION)	
RESORTS, INC.,)	Case No. 3:12-cv-559
)	
Plaintiff,)	
)	
v.)	Judge Nixon
)	Magistrate Judge Knowles
WESLEY FINANCIAL GROUP, LLC)	
CHARLES MCDOWELL, III,)	JURY DEMAND
and)	
JOHN and JANE DOES 1-10,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY

COMES NOW Plaintiff, Wyndham Vacation Resorts, Inc., ("Wyndham") by and through its counsel, and, pursuant to Local Rule 7.01(b), and files this Motion for Leave to File a Reply to respond to the issues and arguments raised by Defendants in their Response, Doc. 10, to Wyndham's Motion for Expedited Discovery, and states as follows:

As fully set forth in its Reply, attached hereto as Exhibit A, Wyndham seeks to respond to issues and arguments raised by Defendants, specifically Defendants' claim that they have not engaged in any wrongful behavior and would suffer hardship if expedited discovery was authorized because Defendant Charles McDowell, III is facing another related civil trial beginning on July 17, 2012. Wyndham seeks to show McDowell, a former Wyndham employee, has engaged in a pattern of wrongfully exploiting Wyndham's trade secrets and confidential information, interfering with Wyndham's contractual and business relations, and violating Tennessee's prohibition of the unauthorized practice of law and that McDowell is facing trial